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8 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 ALONSO FONTES-VERDUGO,
aka "Alonso Fontes-Verduso,"
13 aka "Omar Fontes-Verdugo,"
14 aka "Carlos Gomez Rodriguez,"
aka "Gustavo Venduro-Duarte,"
15 aka "Gabriel A. Gutierrez,"
16 aka "Gabriel Valenzuela,"
aka "Ivan Nieblo,"
17 aka "Ivan Niebles,"
18 aka "Ivan Nieblas,"
aka "Ivan G. Nieblas,"
19 aka "Carlos Lopez,

20 Defendant.

Case No. 2:21-mj-00415-BNW

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

21 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
22 Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States
23 Attorney, counsel for the United States of America, and Brian Pugh, Assistant Federal
24 Public Defender, counsel for Defendant ALONSO FONTES-VERDUGO, that the Court

1 direct the U.S. Probation Office to prepare a report detailing the defendant's criminal
2 history.

3 This stipulation is entered into for the following reasons:

4 1. The United States Attorney's Office has developed an early disposition
5 program for immigration cases, authorized by the Attorney General pursuant to the
6 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
7 extended to the defendant a plea offer in which the parties would agree to jointly request an
8 expedited sentencing immediately after the defendant enters a guilty plea.

9 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
10 history until after the defendant enters his guilty plea unless the Court enters an order
11 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
12 a defendant's initial appearance when charged by indictment.

13 3. The U.S. Probation Office informs the government that it would like to begin
14 obtaining the criminal history of defendants eligible for the early disposition program as
15 soon as possible after their initial appearance so that the Probation Office can complete the
16 Presentence Investigation Report by the time of the expected expedited sentencing.

17 4. Accordingly, the parties request that the Court enter an order directing the
18 U.S. Probation Office to prepare a report detailing the defendant's criminal history.
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1 DATED this 26th day of May, 2021.

2 Respectfully submitted,

3 CHRISTOPHER CHIOU
4 Acting United States Attorney

5 /s/ Brian Pugh
6 BRIAN PUGH
7 Assistant Federal Public Defender
8 Counsel for Defendant ALONSO
9 FONTES-VERDUGO

10 /s/ Jared L. Grimmer
11 JARED L. GRIMMER
12 Assistant United States Attorney
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

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17 aka "Carlos Lopez,

18 Defendant.

Case No. 2:21-mj-00415-BNW

**Order Directing Probation to Prepare
a Criminal History Report
[Proposed]**

19 Based on the stipulation of counsel, good cause appearing, and the best interest of
20 justice being served:

21 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a
22 report detailing the defendant's criminal history.

23 DATED June 4, 2021.

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HONORABLE BRENDA N. WEKSLER
UNITED STATES MAGISTRATE JUDGE